

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BENJAMIN M. GAMORAN, derivatively on behalf of
the nominal defendant with respect to its series
mutual fund, the Neuberger Berman International
Fund,

Plaintiff,

-against-

NEUBERGER BERMAN MANAGEMENT LLC, *et al.*,

Defendants,

-and-

NEUBERGER BERMAN EQUITY FUNDS d/b/a
NEUBERGER BERMAN INTERNATIONAL FUND,

Nominal Defendant.

11 Civ. 7957 (TPG) (KNF)

ECF Case

**NOTICE OF MOTION TO
DISMISS THE COMPLAINT**

Oral Argument Requested

PLEASE TAKE NOTICE that defendants Neuberger Berman Management LLC, Neuberger Berman LLC, Benjamin Segal, Peter E. Sundman, and Jack L. Rivkin (the “Investment Advisor Defendants”), by their undersigned attorneys and upon the Verified Derivative and Class Action Complaint, dated August 24, 2011 (the “Complaint”), the Memorandum of Law in Support of the Investment Advisor Defendants’ Motion to Dismiss the Complaint, the Declaration of Douglas W. Henkin and the exhibits thereto, and upon all prior proceedings had herein, will move this Court, at a date and time to be determined by the Court, for an order in the above-captioned action dismissing the Complaint (Docket No. 1) pursuant to Fed. R. Civ. P. 12(b)(1) and (6), with prejudice, and granting the Investment Advisor Defendants such further and other relief as the Court may deem just and proper.

Dated: New York, New York
December 8, 2011

Respectfully submitted,

MILBANK, TWEED, HADLEY & McCLOY LLP

By: s / Douglas W. Henkin

James N. Benedict

jbenedict@milbank.com

Alan J. Stone

astone@milbank.com

Douglas W. Henkin

dhenkin@milbank.com

Mia C. Korot

mkorot@milbank.com

1 Chase Manhattan Plaza

New York, NY 10005-1413

(212) 530-5000

*Attorneys for Defendants Neuberger Berman
Management LLC, Neuberger Berman, LLC,
Benjamin Segal, Peter E. Sundman, and Jack L.
Rivkin*